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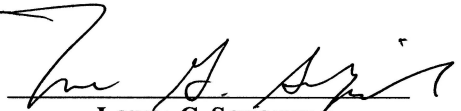
August 9, 2021

Via ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshal United States Courthouse
40 Foley Square
New York, New York 10007

SO ORDERED

Dated: August 11, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Travelers Property Casualty Company of America v. Zurich American Insurance Company, Case No. 1:21-cv-05319-LGS

Dear Judge Schofield:

This firm represents the plaintiff, Travelers Property Casualty Company of America ("Travelers"), in the above referenced matter. I write to request an adjournment of the Initial Pretrial Conference in this matter, currently scheduled for August 26, 2021, until September 23, 2021, or to such other date thereafter as is convenient for the Court, with the joint letter and proposed case management plan and scheduling order (currently due to be submitted on August 19, 2021) to be submitted one week before the adjourned Initial Status Conference date.

The reason for this request is that Defendant Zurich American Insurance Company ("Zurich") has not yet answered or otherwise appeared in this matter. Last week, I was contented by outside counsel, who asked me for my consent to a 30-day extension of time to respond to the Complaint in this action. I advised that I consented to the extension and also advised counsel of the upcoming Initial Pretrial Conference. Counsel requested that I seek an adjournment of this conference. As I understand it from counsel, Zurich is still finalizing representation in this matter (it is not clear to me that counsel who contacted me will ultimately be counsel that appears in this action for Zurich). In any event, Travelers believes it will not be practicable to produce a joint letter and proposed case management plan and scheduling order, and to have a productive Initial Status Conference, before Zurich has finalized representation and its litigation counsel has reviewed the matter.

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Travelers has made no previous request for the relief requested in this letter. Travelers makes this request with the consent of counsel who contacted me on behalf of Zurich.

Very truly yours,

/s/ Amy C. Gross

Amy C. Gross

cc: Adam Smith, Coughlin, Midlige & Garland LLP (via email)

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